

A PROFESSIONAL ASSOCIATION

February 20, 2012

The Honorable Brian Cogan United States District Judge United States District Court 225 Cadman Plaza East Brooklyn, NY 11201

RE:

United States v. Feither Rolando Aponte Castillo Criminal Docket No. o6 CR 799 (S 2) (BMC)

Dear Judge Cogan:

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The above referenced matter is scheduled for a status conference on February 29th, 2012 at 10:30 a.m. Counsel is respectfully requesting that this matter be reset for the end of March to allow the parties to finalize their negotiations in this cause. Since the last adjournment granted by this Honorable Court the Government has concluded it's interviews with the Defendant and is in the process of having the plea agreement drafted and approved. The adjournment requested herein will allow sufficient time for the parties to finalize the plea agreement and have the defendant review same such that the hearing on the change of plea can be scheduled. Accordingly, counsel has conferred with the Assistant United States Attorney, Daniel Spector, Esq., who does not object to (and in fact joins) the requested continuance of the status conference.

Accordingly, the parties jointly request that the Court adjourn the status conference to the date proposed above. The parties respectfully request that the Court exclude the time from February 29th, 2012 through the new date as scheduled by the Court. The parties submit that such an exclusion would serve the ends of justice in this matter and outweighs the best interest of the public and the defendant in a speedy trial pursuant to Title 18, United States Code, Section 3161(h)(7)(A), because it will allow the parties to finalize their disposition of this case. The Government joins in this request.

Respectfully submitted,

Ruben Oliva, Esq.

cc: Daniel Spector, AUSA

ATTORNEYS & COUNSELORS AT LAW